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11 FlatWorld Interactives LLC

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 FLATWORLD INTERACTIVES LLC, a
Pennsylvania limited liability company,
16
17 Plaintiff,
18 v.
19 APPLE INC., a California corporation,
20 Defendant.
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No. C 12-01956 JSW

**FLATWORLD'S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
ITS MEMORANDUM AND
ASSOCIATED DOCUMENTS IN
OPPOSITION TO THE MOTION TO
DISQUALIFY**

**NOTED FOR DECISION ON JUNE
19, 2013**

JURY TRIAL REQUESTED

DATE ACTION FILED: April 19, 2012

Plaintiff FlatWorld Interactives LLC ("FlatWorld") respectfully moves for leave to file portions of its Memorandum in Opposition to Apple's Motion to Disqualify Hagens Berman and Exhibit 4 to the Declaration of Mark Carlson under seal. FlatWorld moves to seal because Exhibit 4 contains excerpts of the transcript of the May 28, 2013 deposition of Michael Ossip, general counsel for Morgan Lewis & Bockius, which Apple Inc. ("Apple") has designated as CONFIDENTIAL-ATTORNEYS' EYES ONLY in its entirety, and FlatWorld's Memorandum contains references to that transcript. FlatWorld does not regard this material as confidential and therefore does not believe that these documents should be filed under seal.

As required by Local Civil Rules 7-11 and 79-5(d), FlatWorld will electronically file a redacted version of its Memorandum in Opposition to the Motion to Disqualify and will lodge unredacted versions of the Memorandum and Exhibit 4 with the Court.

Within seven days, Local Civil Rule 79-5(d) requires Apple, as the designating party, to serve a declaration establishing that the designated information is sealable, and must lodge and serve a narrowly tailored proposed sealing order, or must withdraw the designation of confidentiality. If no responsive declaration is filed, the designated material becomes part of the public record.

DATED: June 11, 2013

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman
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PROOF OF SERVICE

I hereby certify that on June 11, 2013, I electronically filed the foregoing document and a PROPOSED ORDER using the CM/ECF system which will send notification of such filing to the email addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List. Any non-CM/ECF participants will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Steve W. Berman
Steve W. Berman